

An organization organized and operated to further, encourage, and recognize outstanding achievements and contributions of citizens of a particular State toward the progress and betterment of human endeavor is exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1954.

Advice has been requested whether an organization organized and operated to further, encourage, and recognize outstanding achievements and contributions of citizens of a particular State toward the progress and betterment of human endeavor is exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code of 1954.

The organization, in accordance with its purpose, examines and evaluates acts of the citizens of the State and on the basis of its study, selects for public recognition and awards those individuals who are determined to have made outstanding contributions and achievements in social, cultural, and technological areas (including commerce, communications, creative arts and crafts, education, finance, government, law, medicine and health, performing arts, religion, science, social services, sports and athletics, technology, and transportation).

Section 501(c)(3) of the Code provides, in part, for the exemption of corporations organized and operated exclusively for charitable purposes.

In the case of *Bok v. McCaughn*, 42 Fed. (2d) 616 (1930), the court held that a trust formed to make awards to citizens of Philadelphia who rendered conspicuous service to that city was a charitable trust and hence that a contribution to the trust was deductible under the charitable contributions provision of the Revenue Act applicable in that case.

Similarly, the organization herein described is exempt from Federal income tax under section 501(c)(3) of the Code.

An organization which considers itself within the scope of this Revenue Ruling must, in order to establish exemption under section 501(c)(3) of the Code, file an application on Form 1023, Exemption Application, with the District Director of Internal Revenue for the internal revenue district in which is located the principal place of business or principal office of the organization. See section 1.501(a)-1 of the Income Tax Regulations.